

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES OF AMERICA	§	
	§	
	§	CAUSE NO. 4:24-CR-0224
VS.	§	(THE HON. LEE H. ROSENTHAL)
	§	
ENRIQUE ROBERTO CUELLAR	§	
IMELDA RIOS CUELLAR	§	

JOINT MOTION FOR WAIVER OF PERSONAL APPEARANCE

Defendants Enrique Roberto Cuellar and Imelda Rios Cuellar through their attorneys jointly move to waive their personal appearances at the hearing set for July 31, 2024, at 10:30 a.m. on the Defendants' Opposed Motion to Compel Government to Allow Counsel to Apply for Security Clearance filed on July 15, 2024 [Dkt. 48].

Mr. and Mrs. Cuellar have been provided copies of the Motion and Government's Response; they understand the substance and purpose of the motion; and they have been informed of the scheduled hearing; and they wish to waive their appearance. The Defendants respectfully request that the Court proceed with the hearing in their absence. Their signed acknowledgments and waivers are below.

Respectfully submitted:

/s/ Eric Reed

Eric Reed
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/s/ Chris Flood

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ATTORNEYS FOR
ENRIQUE ROBERTO CUELLAR


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/s/ Derek S. Hollingsworth

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ATTORNEY FOR
IMELDA RIOS CUELLAR

I have consulted with my attorneys regarding the Opposed Motion to Compel Government to Allow Counsel to Apply for Security Clearance filed on July 15, 2024, and the hearing scheduled before the Court on July 31, 2024. I understand the substance and purpose of that motion, as well as my right to attend the scheduled hearing, and I hereby waive my right to attend the hearing and ask the Court to proceed in my absence.

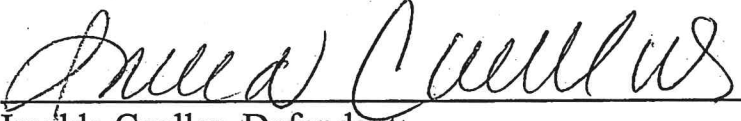


Enrique Roberto Cuellar, Defendant

Imelda Cuellar, Defendant

I have consulted with my attorneys regarding the Opposed Motion to Compel Government to Allow Counsel to Apply for Security Clearance filed on July 15, 2024, and the hearing scheduled before the Court on July 31, 2024. I understand the substance and purpose of that motion, as well as my right to attend the scheduled hearing, and I hereby waive my right to attend the hearing and ask the Court to proceed in my absence.

Enrique Roberto Cuellar, Defendant



Imelda Cuellar, Defendant

Certificate of Conference

On July 29, 2024, I attempted to consult with counsel for the government regarding the government's position on this Motion, and as of the time of filing, I no response has been received. However, given the short time frame provided the government to state its position and the need to provide the Court with the Waivers, counsel will update the Court regarding the government's position once a response is received.

Eric Reed
Eric Reed

Certificate of Service

On July 29, 2024, this Waiver of Appearance was filed using the Court's electronic filing system, and copies were automatically sent to all counsel of record. Copies were also provided to counsel for the government by electronic mail.

Eric Reed
Eric Reed